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*Via ECF*

June 21, 2022

The Honorable Mary Kay Vyskocil  
United States District Court for the  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: ***Niram, Inc. v. Sterling National Bank***  
**Civil Action No. 1:21-cv-05966-MKV**  
**Joint Request to Adjourn Conference**

Dear Judge Vyskocil,

We represent Defendant Sterling National Bank n/k/a Webster Bank, N.A. (“Sterling”) in the above-referenced action.

We write on behalf of all Parties to respectfully request an adjournment of the in-person Post-Discovery Conference, currently scheduled for August 29, 2022. The Parties respectfully request that the Post-Discovery Conference be adjourned to the week beginning on September 26, 2022. Counsel for all Parties are currently available any time that week.

Good cause exists for this requested adjournment. Sterling’s principal trial counsel, Edward Heath, has a previously scheduled conflict on August 29<sup>th</sup> and is not available that day. In addition, the undersigned is expected to be out of town that week on a family vacation.

This is the Parties’ first request for an adjournment of the Post-Discovery Conference, currently scheduled for August 29, 2022.

# Robinson+Cole

The Honorable Mary Kay Vyskocil  
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In addition, and assuming the Court is amenable to adjourning the Post-Discovery Conference, the Parties write to respectfully request that the Fact and Expert Discovery deadlines be adjourned to September 19, 2022. The current deadlines are June 21 and August 22, respectively. This additional time would be helpful to coordinate fact witness and expert depositions in light of conflicting schedules in the coming months. For the Court's reference, the Parties are in the process of depositions, including third party depositions.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

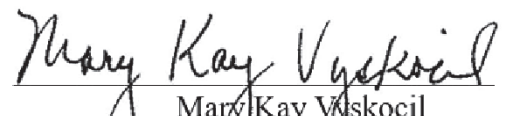


Ian T. Clarke-Fisher

Copy to: Joseph A. Matteo, Esq. (via ECF)

This request is granted. The Post Discovery Conference is adjourned to September 29, 2022 at 11:30 a.m. in Courtroom 18C of 500 Pearl Street, New York, NY 10007. All discovery must be complete by September 19, 2022. A joint status letter and any pre-motion submissions are due one week before the conference, in accordance with the Court's Individual Rules. No further adjournments of these dates will be granted absent extraordinary circumstances.

Date: June 21, 2022  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge